



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

OCT 30 2015

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Dawn Winalski  
Assistant Borough Attorney  
North Slope Borough  
P.O. Box 69  
Barrow, Alaska 99723

Re: Request for Information Pursuant to Section 3007 of the Resource Conservation and Recovery Act, Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, Section 114 of the Clean Air Act, and Sections 308 and 311 of the Clean Water Act

Dear Ms. Winalski:

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927(a), the United States Environmental Protection Agency (EPA) may require any person who generates, stores, transports or otherwise handles hazardous waste to furnish information related to that waste. Under the provisions of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(e), EPA may require any person who has or may have information relevant to (1) the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a facility; (2) the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; or (3) information relating to the ability of a person to pay for a or to perform a cleanup to furnish, upon reasonable notice, information or documents relating to such matter. Under the provisions of Section 114(a)(1) of the Clean Air Act, 42 U.S.C. § 7414(a)(1), EPA may require any person who owns or operates any emission source who is subject to any requirement under the Clean Air Act (CAA) to provide information the EPA requires to determine whether any person is in violation of any emissions standard promulgated under Section 112 of the CAA. Under the provisions of Sections 308(a) and 311(m) of the Clean Water Act (CWA), 33 U.S.C. §§ 1318(a), 1321(m), EPA may require the owner or operator of any point source to provide information to EPA to determine whether any person is in violation of any prohibition or for carrying out Section 311 of the Act. Pursuant to EPA's authority set forth in Section 3007(a) of RCRA, Section 104(e) of CERCLA, Section 114 of CAA, and Sections 308 and 311(m) of the CWA, you are required to submit the requested information and necessary supporting documentation to the questions set forth in Enclosure C within forty-five (45) calendar days of your receipt of this letter.

All terms not defined in this Information Request shall have their ordinary meaning, unless such terms are defined in Section 1004 of RCRA, 42 U.S.C. § 6903, Section 101 of CERCLA, 42 U.S.C. § 9601, Sections 111 and 112 of the CAA, 42 U.S.C. §§ 7411 and 7412, and Section 502 of the CWA, 33 U.S.C. § 1362, or Title 40 of the Code of Federal Regulations, in which case such statutory or regulatory definition shall apply. Please provide a separate narrative response to each request and

provide any and all documents relied upon or related to your response to each request. Precede each answer with the number of the question and letter of the subpart of the question to which it corresponds. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. If requested information or documents are not known or are not available to you at the time of your response to this information request, but later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.

Please send the requested information and your attestation to:

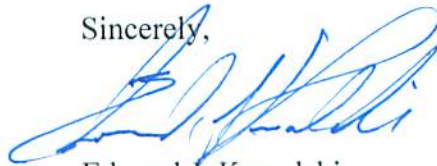
Jennifer Parker  
U. S. Environmental Protection Agency, Region 10  
Air and RCRA Compliance Unit  
1200 Sixth Avenue, Suite 900, OCE-101  
Seattle, Washington 98101

The information requested must be submitted whether or not you regard all or part of it as a trade secret or confidential information. You may, if you desire, assert a claim of business confidentiality, covering all or part of the information submitted, as provided in 40 C.F.R. Part 2, Subpart B. All information claimed as confidential should be contained on a separate sheet(s) and should be clearly identified as "confidential," "trade secret," or "proprietary." Please note that you bear the burden of substantiating your confidentiality claim. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. Information subject to a business confidentiality claim may be disclosed by EPA only to the extent and pursuant to the procedures set forth in 40 C.F.R. Part 2, Subpart B. You should read the above-cited regulations carefully before asserting a business confidentiality claim because certain categories of information are not the proper subject of such a claim.

Failure to comply with or respond adequately to an information request may subject you to civil penalties under RCRA, CERCLA, CAA, or CWA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

If you have any questions relating to this Information Request, you may contact Brett Dugan, Office of Regional Counsel, at (206) 553-8562.

Sincerely,



Edward J. Kowalski  
Director

## ENCLOSURE A

### **Instructions:**

1. Identify the person(s) responding to these Information Requests on behalf of Respondent. See Enclosure B for the definition of "identify." Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for or at the company.
2. A separate narrative response must be made to each of the Information Requests set forth herein.
3. Precede each answer with the number of the Information Request to which it corresponds.
4. In answering each Information Request, identify all documents and persons consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents.
5. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Request to which it responds.
6. Provide an index that lists all the responsive documents provided, and that indicates where each document is referenced in the written response, and to which question or questions each document is responsive.
7. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA thereof as soon as possible.
8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Request, you must respond to the Request with a written response.
9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
10. For each question, identify all persons and documents you relied on for your answer.
11. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

12. Information that you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.305(h) and 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request.
13. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information". You should note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you.
14. While you may object to certain questions in this Information Request, you must provide responsive information notwithstanding those objections. To object without providing responsive information may subject you to the penalties set out in the cover letter.
15. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document that are responsive to the Information Request must be disclosed in your response.
16. You are requested to complete the enclosed declaration. An authorized official of the North Slope Borough must sign the declaration in hard copy certifying the accuracy of all statements in your response.

## ENCLOSURE B

### **Definitions:**

The following definitions shall apply to the following words as they appear in Enclosure C.

1. The terms "AND" and "OR" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside their scope.
2. The terms "ASBESTOS," "ASBESTOS-CONTAINING WASTE MATERIALS," "ADEQUATELY WET," "DEMOLITION," and "WASTE DISPOSAL SITE," shall have the definitions set forth in the Asbestos NESHAP (40 C.F.R. §§ 61.141, 61.145, and 61.150).
3. The term "COMPANY" shall mean corporate entity, company, business, association, organization, institution, limited liability company, or partnership.
4. The term "CONTAINER" shall mean any portable device in which a material or waste is stored, transported, treated, disposed of, or otherwise handled.
5. The term "CONTINGENCY PLAN" shall mean a document setting out an organized, planned, and coordinated course of action to be followed in case of a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.
6. The term "DISPOSAL" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any waste into or on any land or water so that such waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
7. The term "DOCUMENT" and "DOCUMENTS" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by way of illustration and not by way of limitation), any e-mail, invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, inter-office or intra-office communications, photostat or other copy of any documents, microfilm or other film record, photograph, sound recording on any type of device, punch card, disc or disc pack, tape or other type of memory generally associated with computers and data processing; including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure, notation, annotation, or the like of it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

8. The term "FACILITY" shall mean all contiguous land, and structures, other appurtenances, and improvements on the land, used for generating, treating, storing, or disposing of hazardous waste.
9. The terms "FACILITY RESPONSE PLAN" or "FRP" shall mean the plan required by 40 C.F.R. § 112.20.
10. The term "GENERATE" shall mean any act or process which produces waste or an act which first causes a waste to become subject to regulation.
11. The term "HAZARDOUS WASTE" shall mean the term defined in 40 C.F.R. § 261.3.
12. The term "WASTE CONTAINER" and "HAZARDOUS WASTE CONTAINER" shall mean any container that contains waste or hazardous waste, if applicable.
13. The term "HAZARDOUS WASTE MANAGEMENT" shall mean the term defined in Section 1004(7) of RCRA, 42 U.S.C. § 6903(7).
14. The term "IDENTIFY" shall mean, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
15. The term "IDENTIFY" shall mean, with respect to a corporation, partnership, business trust or other associate of business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
16. The term "IDENTIFY" shall mean, with respect to a document, to provide its customary business description, date, number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
17. The term "OIL" shall mean the term defined at 40 C.F.R. § 112.2.
18. The term "PERSON" includes, in the plural as well as the singular, any natural person, firm, unincorporated associate partnership, corporation, trust or other entity.
19. The term "SOLID WASTE" shall mean the term defined in 40 C.F.R. § 262.2.
20. The terms "SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN" or "SPCC PLAN" shall mean the terms defined in 40 C.F.R. § 112.2.
21. The terms "STORE" and "STORAGE" shall mean the holding of waste for a temporary period, at the end of which the waste is treated, disposed of, or stored elsewhere.
22. The term "TRANSPORTATION", "TRANSPORT", and "SHIPMENT" shall mean the

movement of material or waste by air, rail, highway, or water.

23. The term "UNIVERSAL WASTE" shall mean the term defined in 40 C.F.R. § 273.9.

24. The term "USED OIL" shall mean the term defined in 40 C.F.R. § 279.1.

25. The term "YOU" or "RESPONDENT" shall mean the addressee of this Information Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents.

## ENCLOSURE C

Answer Every Question Completely. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Request for Information and may subject you to enforcement action, including the penalties set out in the cover letter.

### I. KAKTOVIK, ALASKA

1. Prior to September 1, 2014, did the North Slope Borough own and/or operate the facility known as the "Power Plant and Washeteria" in Kaktovik, Alaska?
2. What was the function of the Power Plant and Washeteria?
3. Provide a floor plan of the Power Plant and Washeteria indicating the square footage and former use of each room.
4. Did the North Slope Borough demolish, or engage a third party to demolish, the Power Plant and Washeteria in 2014?
5. Describe the North Slope Borough's activities at the Power Plant and Washeteria prior to demolition.
6. Describe the activities of any individuals or entities at the Power Plant and Washeteria prior to demolition.
7. Identify when demolition work first started at the Power Plant and Washeteria.
8. Identify all persons and entities involved with the demolition of the Power Plant and Washeteria, including who authorized the demolition and who performed the work (e.g., North Slope Borough employees, private contractors, etc.).
9. Identify and provide copies of any and all correspondence, contracts, and/or agreements between the North Slope Borough and third-party contractors authorizing the demolition of the Power Plant and Washeteria.
10. Identify and provide copies of any and all contracts with contractors hired to demolish the Power Plant and Washeteria.
11. Did the Power Plant and Washeteria, prior to demolition, contain any asbestos containing material ("ACM")? If so, describe the location of the ACM and the amount of ACM.
12. Identify and provide copies of any and all asbestos building inspection surveys of the Old Power Plant and Washeteria conducted before, during, and/or after the demolition.
13. Identify and provide copies of asbestos training records for any persons, including supervisors, who were present on-site during the demolition of the Power Plant and Washeteria. For each person, describe his or her job title or area of responsibility.
  - a. Identify whether any and all asbestos training records identified above were posted on-site during the demolition of the Power Plant and Washeteria.
14. Describe in detail the work methods used to demolish the Power Plant and Washeteria, including the types of heavy equipment or tools used and any use of methods to



adequately wet building materials both during the demolition process and through the time the waste materials were disposed.

15. Identify and provide copies of any and all daily work logs which describe the type of work done each day while demolition of the Power Plant and Washeteria was taking place.
16. Did the Power Plant and Washeteria, prior to demolition, contain fluorescent light tubes? If so, provide the number of each length and type of tube.
17. Did the Power Plant and Washeteria, prior to demolition, contain any light ballasts that contained PCBs? If so, provide the number of light ballasts containing PCBs.
18. Did the Power Plant and Washeteria, prior to the start of demolition, contain any batteries? If so, provide the number of batteries.
19. Prior to demolishing the Power Plant and Washeteria, was any solid waste (including ACM, fluorescent light tubes, light ballasts, and batteries) generated at the Power Plant and Washeteria? If so, provide an inventory of all solid wastes generated at the Power Plant and Washeteria that includes the following information:
  - a. Type of solid waste,
  - b. Quantity (either in weight, volume, or unit, as applicable) of waste generated,
  - c. Date of generation of each container or unit of solid waste,
  - d. The location(s) where and dates when any wastes were moved and stored prior to ultimate disposal of the wastes,
  - e. Date of ultimate disposal of the waste,
  - f. A description of the container (if any) in which the waste was stored prior to disposal, and
  - g. A description of any labeling affixed to the waste or container during storage and disposal of the waste.
20. Where were the solid wastes generated at the Power Plant and Washeteria disposed? Provide any and all records of shipment and disposal for all solid wastes.
21. Was any soil removed from the site of the Power Plant and Washeteria during or after the demolition? If so, provide the following information:
  - a. The quantity of soil (in cubic yards);
  - b. The results of any analytical samples taken of the soil;
  - c. Any and all manifests and/or shipment records that document the disposal of the soil.

## II. POINT LAY, ALASKA

- 1) Does the North Slope Borough lease or own any of the following properties in Point Lay, Alaska: (a) the facility known as the "Air Force Hangar," (b) the facility known as the "Air Force Garage," including adjacent shipping containers, and (c) the facility known as the

**“Warm Storage Building,” including surrounding gravel pad? If so, provide lease agreements or property records associated with the aforementioned properties.**

- 2) What entity or entities operated the following properties in Point Lay, Alaska: (a) the facility known as the “Air Force Hangar,” (b) the facility known as the “Air Force Garage,” including adjacent shipping containers, and (c) the facility known as the “Warm Storage Building,” including surrounding gravel pad, from 1995 until the present?**
- 3) Describe the nature of the North Slope Borough’s activities at, and use of, the Air Force Hangar, Air Force Garage and the Warm Storage Building, including surrounding gravel pad, respectively, from 1998 until the present.**
- 4) Is the North Slope Borough aware of any oil/fuel spills to navigable waters, surface waters, shorelines or surrounding wetlands within the past 5 years? There are no volume restrictions associated with this request.**
  - a) If so, state the quantity of oil spilled into navigable waters, surface waters, shorelines or surrounding wetlands, the date of the spill, and the location of the spill. For each spill indicate whether the oil caused a film or sheen upon or discoloration of any navigable waters, surface waters, shorelines, or surrounding wetlands.**
- 5) Is the North Slope Borough familiar with the Spill Prevention, Control, and Countermeasures regulations described in 40 C.F.R. Part 112? Taking into consideration all containers with a storage capacity of 55 gallons and greater, how much oil/fuel storage is stored on property owned, leased, or operated by the North Slope Borough in Point Lay, Alaska?**
- 6) If applicable, please provide a copy of all SPCC plans for the North Slope Borough’s oil storage at Point Lay, Alaska. If applicable, please provide a copy of any FRPs.**
- 7) If applicable, describe all secondary containment measures taken at the facility for onsite oil/fuel storage containers with a volume capacity of at least 55 gallons.**
- 8) When was the Warm Storage Building constructed?**
- 9) From what materials is the gravel pad on which the Warm Storage Building was built constructed? Provide any and all construction or engineering as-built or final drawings of the constructed gravel pad or if there are no final drawings of the gravel pad, then provide plan specifications, including drawings, used to construct the gravel pad.**
- 10) Describe the material of construction of the Air Force Hangar floor. Were there any cracks or holes in the floor while waste was being stored in the Hangar? If you answered yes, please provide a description of the cracks and holes (if photos are available, they may be included in your response). Is the perimeter of the Air Force Hangar bermed? If so, what is the height of the berm and material of construction?**
- 11) Describe the material of construction of the Air Force Garage floor. Were there any cracks or holes in the floor while solid waste was being stored in the Garage? If you answered yes, please provide a description of the cracks and holes (if photos are available, they may be included in your response). Is the perimeter of the Air Force Garage bermed? If so, what is the height of the berm and material of construction?**

- 12) Was any solid waste stored on the gravel pad south of the Warm Storage Building, the Air Force Hangar, or the Air Force Garage, including adjacent shipping containers, between 2013 and 2015? If so, for each location, provide the following information:
- a) When was the solid waste generated?
  - b) Who generated the solid waste?
  - c) What person or persons had custody or possession of the solid waste during storage?
  - d) Describe the activities that generated the solid waste.
  - e) Describe the containers in which the solid waste was stored.
  - f) Did the containers have secondary containment with a volumetric capacity to contain the entire capacity of the container with sufficient freeboard to contain precipitation?
  - g) How long was the solid waste stored?
  - h) Was the solid waste moved to the gravel pad south of the Warm Storage Building, the Air Force Hangar, and the Air Force Garage, including adjacent shipping containers, from any other location(s) prior to September 1, 2014? If so, describe all the areas where the solid waste was stored for each location prior to September 1, 2014, who had custody of the solid waste during storage, and the approximate dates of movement of the solid waste.
  - i) Did the North Slope Borough or a third-party on behalf of the North Slope Borough conduct any waste characterization analysis, including chemical analysis on the solid waste? If so, provide any and all documents relating to waste characterization analysis, including solid waste inventories.
  - j) Provide an inventory of the solid waste stored at the gravel pad south of the Warm Storage Building, the Air Force Hangar, and the Air Force Garage, including adjacent shipping containers, which includes the following:
    - i) Unique identification number of each container of solid waste stored,
    - ii) Material of construction of container,
    - iii) Volume of the container,
    - iv) Volume of material in the container,
    - v) Narrative description of the waste,
    - vi) Whether the solid waste was in liquid or solid phase,
    - vii) Date of generation,
    - viii) Duration of storage,
    - ix) The pH of the solid waste,
    - x) The flash point of the solid waste,
    - xi) The quantity in parts per million of metals listed in Table 1 of 40 C.F.R. § 261.24 as measured using the Toxicity Characteristic Leaching Procedure described in that section,
    - xii) Whether the solid waste was "hazardous waste,"

- xiii) Whether the solid waste was “used oil,”
  - xiv) Date of disposal, if applicable.
- k) Provide the following information regarding the containers of hazardous waste:
- i) Were all of the containers labeled with the words “hazardous waste” for the entire duration in which the containers stored waste? If no, how many of the containers were labeled with the words, “hazardous waste” for the entire duration in which the container stored waste?
  - ii) Were all of the containers labeled with the date on which accumulation began? If no, how many of the containers were labeled with the date on which accumulation began?
  - iii) Describe the condition of the containers (i.e. were the containers leaking, cracked, rusting, corroding, or bulging?)
- l) Provide the following information regarding the containers of Used Oil:
- i) Were all of the containers labeled with the words “Used Oil?” If no, how many of the containers were labeled with the words, “used oil?”
  - ii) Describe the condition of the containers (i.e. were the containers leaking, cracked, rusted, corroded, or bulging?)
- m) Provide the following information regarding any lead-acid batteries:
- i) Were the battery casings or containers of batteries labeled or marked with any one of the following phrases: “Universal Waste—Battery” or “Waste Battery” or “Used Battery?”
  - ii) Were any of the batteries cracked or leaking electrolyte? If so, were the cracked or leaking batteries stored in a leak-proof container made of material compatible with the electrolyte?
  - iii) Were any of the batteries stored outdoors without a container? If so, how many batteries were stored outside and for what duration?
- n) Has any of the solid waste been removed from Point Lay for disposal? If so, provide records of removal, including hazardous waste manifests or bills of lading.
- 13) Between 2013 and 2015 did any person conduct inspections of areas where containers of hazardous waste were stored? If so, provide any and all documentation of inspections of areas where hazardous waste was stored.
- 14) Were any of the employees of the North Slope Borough or independent contractors working under contract to the North Slope Borough in Point Lay between 1998 and the present trained on hazardous waste management? If so, provide training records for each person trained, including the date of training, a description of the training, and the name of the training provider(s).
- 15) At any time during the North Slope Borough’s leasing of the Air Force Garage was solid waste drained through a hole in the Garage to the ground surface. If so, what solid wastes were drained to the ground, when were the solid wastes drained, provide any analytical samples of the soil in which the solid wastes were drained. If any of the drained solid wastes

have been removed or remediated, provide documentation of the removal/remediation activities.

### III. OTHER FACILITIES AND OTHER COMMUNITIES

- 1) With the exception of the South Pad Facility in Barrow, Alaska, has the North Slope Borough generated solid waste at any other facilities in Point Lay or Kaktovik or in any other communities (e.g., Anaktuvuk Pass, Atkasuk, Barrow, Nuiqsut, Point Hope, Wainwright) from 2010 to present? If yes, answer the following:
  - a) List by facility all solid wastes generated by North Slope Borough since January 1, 2010. Examples of solid wastes that may be generated include used oil and spent antifreeze; spent solvents; paint wastes; rags contaminated with oil or solvents; solvent still bottoms; sediment or sludge removed from parts washers or caustic cleaning tanks; spent filters (e.g., from paint booths, can puncture units, antifreeze or solvent distillation units); spent sand blast grit; spill cleanup residues; spent fluorescent lamps; used batteries; and excess or outdated products.
  - b) Describe when and how North Slope Borough determined if each of these solid wastes are hazardous wastes (as required by 40 C.F.R. § 262.11).
  - c) Provide the names, titles, and qualifications of the employees making waste determinations at each facility.
  - d) Provide copies of all records kept to document hazardous waste determinations made for hazardous waste generated since January 1, 2010, at each facility.
  - e) List all of the hazardous wastes that North Slope Borough facilities have generated since January 1, 2010, and identify the quantity in pounds of each hazardous waste that has been generated per month by each facility. For each waste, provide the applicable RCRA waste code(s) and a general description of the waste.
  - f) Describe how each of the North Slope Borough facilities generating hazardous wastes since January 1, 2010, managed these hazardous wastes. Include information on storage, treatment, and disposal.
  - g) List by facility all of the wastes that North Slope Borough facilities have managed as universal waste pursuant to 40 C.F.R. Part 273 since January 1, 2010.
  - h) Describe how each of the North Slope Borough facilities generating universal wastes managed these wastes since January 1, 2010. Include information on storage, treatment, and disposal.
  - i) Provide copies of all records (such as manifests, bills of lading, and notices and records produced pursuant to 40 C.F.R. § 268.7) kept for hazardous wastes, universal wastes, and used oil sent offsite from each facility generating such materials since January 1, 2010.

## DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on \_\_\_\_\_, 2015.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Type or Print Name

\_\_\_\_\_  
Title